

**RICHARD E. TANASI, ESQ.**  
Nevada Bar No. 9699  
**TANASI LAW OFFICES**  
8716 Spanish Ridge Ave., Ste. 105  
Las Vegas NV 89148  
Telephone: (702) 906-2411  
Facsimile: (866) 299-5274  
*Attorney for Plaintiff/Defendant*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA

Plaintiff,

vs.

JEREMI FAJARDO

Defendant.

CASE NO.: 2:18-cr-363-JAD-EJY

**STIPULATION TO  
CONTINUE PRETRIAL  
MOTION DEADLINE  
(5<sup>TH</sup> REQUEST)**

IT IS HEREBY STIPULATED AND AGREED, by and between United States of America, by and through Nicholas A. Trutanich, United States Attorney, and Brian Y. Whang, Assistant United States Attorney, JEREMI FAJARDO, by and through his attorney and Richard E. Tanasi, that ONLY the PRETRIAL MOTION DEADLINES currently schedule for November 22, 2019 be vacated and continued to a dated and time convenient to the Court, but no sooner than (30) days. This is the Fifth request for a continuance of pretrial motion deadlines.

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Pursuant to General Order No. 2007-04, this Stipulation is entered into for the following reasons:

1. The defense needs more time to investigate possible motion grounds.
2. The parties are negotiating.
3. The defendant is incarcerated and does not object to the continuance.
4. The parties agree to the continuance.
5. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for all defendant sufficient time within which to be able to effectively and complete investigation of the discovery materials provided.
6. For the above-stated reason, the ends of justice would best be served by a continuance of the pretrial motion deadlines.

DATED this 14th day of November, 2019.

| U.S. ATTORNEY'S OFFICE   | TANASI LAW OFFICES   |
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| <u>/s/</u><br>Brian Y. Whang<br>501 Las Vegas Blvd., South<br>Suite 100<br>Las Vegas, NV 89101<br>Attorney for the UNITED STATES | <u>/s/</u><br>RICHARD E. TANASI, ESQ.<br>8716 Spanish Ridge Avenue, Ste. 105<br>Las Vegas, NV 89148<br><a href="mailto:rtanasi@tanasilaw.com">rtanasi@tanasilaw.com</a><br>Attorney for JEREMI FAJARDO |

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UNITED STATES OF AMERICA  
  
Plaintiff,  
  
vs.  
  
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CASE NO.: 2:18-cr-363-JAD-EJY

**STIPULATION TO  
CONTINUE PRETRIAL  
MOTION DEADLINE  
(5<sup>TH</sup> REQUEST)**

Based upon the pending Stipulation of the parties, and good cause appearing therefore,  
the Court finds that:

A. The parties have stipulated to continue the calendar call and trial dates as presently  
scheduled.

B. This Court, being convinced that adequate showing has been made that were this  
request for continuance to be denied, counsel would not have the necessary time to effectively  
prepare for trial, taking into account the exercise of due diligence, and a miscarriage of justice  
could result, based on the following:

1. The defense needs more time to investigate possible motion grounds.
2. The parties are negotiating.
3. The defendant is incarcerated and does not object to the continuance.
4. The parties agree to the continuance.

1           5.       The additional time requested herein is not sought for purposes of delay, but  
2 merely to allow counsel for all defendant sufficient time within which to be able to effectively  
3 and complete investigation of the discovery materials provided.  
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5           6.       For the above-stated reason, the ends of justice would best be served by a  
6 continuance of the pretrial motion deadlines.

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**ORDER**

IT IS THEREFORE ORDERED that the parties shall have to and including December 27, 2019 to file any and all pretrial motions and notices of defenses.

DATED this 18th day of November, 2019

  
UNITED STATES DISTRICT JUDGE